



BellSouth Telecommunications, Inc.

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REGULATORY AUTH.

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July 22, 2002
EXECUTIVE SECRETARY

Guy M. Hicks

General Counsel

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VIA HAND DELIVERY

The Honorable Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Docket to Determine the Compliance of BellSouth
Telecommunications, Inc.'s Operations Support Systems with State
and Federal Regulations*
Docket No. 01-00362

Dear Chairman Kyle:

Enclosed please find the original and fourteen copies of BellSouth Telecommunications, Inc.'s Reply to Opposition of AT&T Communications of the South Central States ("AT&T") and MCI WorldCom, Inc. ("WorldCom") to BellSouth's Motion for Reconsideration. Copies have been provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH/jej

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In Re: *Docket to Determine the Compliance of BellSouth
Telecommunications, Inc.'s Operations Support Systems with State
and Federal Regulations*

Docket No. 01-00362

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
REPLY TO OPPOSITION OF AT&T COMMUNICATIONS OF THE
SOUTH CENTRAL STATES ("AT&T") AND
MCI WORLDCOM, INC. ("WORLDCOM")
TO BELLSOUTH'S MOTION FOR RECONSIDERATION**

BellSouth Telecommunications, Inc. ("BellSouth") files this limited Reply in order to respond to certain issues raised in the Opposition of AT&T and WorldCom to BellSouth's Motion to Reconsider. BellSouth relies on its earlier pleading regarding the substantive issues raised in its Motion. However, BellSouth files this limited response to address the procedural issues discussed in the opposition.

In footnote 2 of the opposition, AT&T and WorldCom characterize BellSouth's motion for reconsideration as a motion for rehearing under T.C.A. § 65-2-114. Consistent with the title of the motion, BellSouth's motion was filed pursuant to TRA Rule 1220-1-2-.20 and T.C.A. § 4-5-317(a), which authorizes motions for reconsideration. BellSouth's motion does not seek rehearing, and T.C.A. § 65-2-114 authorizing motions for rehearing was not cited by BellSouth in its motion. Accordingly, the legal argument and authority presented by AT&T and

WorldCom regarding motions for rehearing pursuant to T.C.A. § 65-2-116 are inapplicable to a motion to reconsider and thus inapplicable to the present motion.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2002, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

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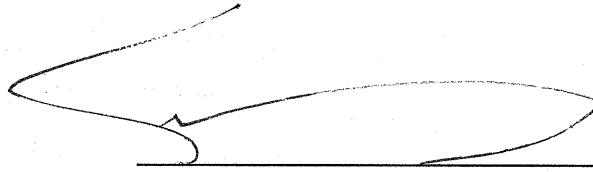
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A handwritten signature in black ink, appearing to read "Terry Monroe", is written over a horizontal line.